

Message

From: Hambrick, Amy [Hambrick.Amy@epa.gov]
Sent: 9/30/2019 3:46:29 PM
To: jturner@rockcliffenergy.com
CC: Marsh, Karen [Marsh.Karen@epa.gov]
Subject: RE: EPA web inquiry (Turner)

Hi John,

Thank you for your inquiry to EPA's website. Please note EPA is in the process of revising OOOOa (read [here](#) and [here](#)); until those proposed changes are finalized, the OOOOa requirements are as followed at [40 CFR part 60 subpart OOOOa](#) . To respond to the two questions you ask, please see below.

1. Exactly what equipment needs to be in photograph to comply with well affected facilities: Flowback separator and combustion device?

I am not sure which section of the regulation you are referring to e.g., fugitives monitoring or well completions? I'm guessing well completions based on how you worded the question. But just in case , below, I pulled out the reg. text for both of those sections to describes the exact requirements for photos. I do recommend you look at the surrounding paragraphs in OOOOa for full context.

FUGITIVES MONITORING

Please see §60.5397a(h)(3)(ii)

“(ii) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken, must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).”

WELL COMPLETIONS

Please see §60.5410a(a)(4)

“(4) For each well affected facility subject to both §60.5375a(a)(1) and (3), as an alternative to retaining the records specified in §60.5420a(c)(1)(i) through (iv), you may maintain records in accordance with §60.5420a(c)(1)(v) of one or more digital photographs with the date the photograph was taken and the latitude and longitude of the well site imbedded within or stored with the digital file showing the equipment for storing or re-injecting recovered liquid, equipment for routing recovered gas to the gas flow line and the completion combustion device (if applicable) connected to and operating at each well completion operation that occurred during the initial compliance period. As an alternative to imbedded latitude and longitude within the digital photograph, the digital photograph may consist of a photograph of the equipment connected and operating at each well completion operation with a photograph of a separately operating GPS device within the same digital picture, provided the latitude and longitude output of the GPS unit can be clearly read in the digital photograph.”

CENTRIFUGAL COMPRESSOR AND STORAGE VESSELS

Please see §60.5413a(d)(10)

“(10) Visible emissions must be determined using Method 22 of appendix A-7 of this part. The test must be performed continuously during each test run. A digital color photograph of the exhaust point, taken from the position of the observer and annotated with date and time, must be taken once per test run and the 12 photos included in the test report specified in paragraph (d)(12) of this section.”

RECORD KEEPING AND REPORTING

Please see §60.5420a(c)(1)(v)

“(v) For each well affected facility required to comply with both §60.5375a(a)(1) and (3), if you are using a digital photograph in lieu of the records required in paragraphs (c)(1)(i) through (iv) of this section, you must retain the records of the digital photograph as specified in §60.5410a(a)(4).”

Please see §60.5420a(c)(2)(vii)

“(vii) As an alternative to the requirements of paragraph (c)(2)(iv) of this section, you may maintain records of one or more digital photographs with the date the photograph was taken and the latitude and longitude of the centrifugal compressor and control device imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital photograph, the digital photograph may consist of a photograph of the centrifugal compressor and control device with a photograph of a separately operating GPS device within the same digital picture, provided the latitude and longitude output of the GPS unit can be clearly read in the digital photograph.”

Please see §60.5420a(c)(5)(vi)(G)

“(G) As an alternative to the requirements of paragraph (c)(5)(vi)(D) of this section, you may maintain records of one or more digital photographs with the date the photograph was taken and the latitude and longitude of the storage vessel and control device imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital photograph, the digital photograph may consist of a photograph of the storage vessel and control device with a photograph of a separately operating GPS device within the same digital picture, provided the latitude and longitude output of the GPS unit can be clearly read in the digital photograph.”

Please see §60.5420a(c)(15)(ii)(E)

“(E) When optical gas imaging is used to perform the survey, one or more digital photographs or videos, captured from the optical gas imaging instrument used for conduct of monitoring, of each required monitoring survey being performed. The digital photograph must include the date the photograph was taken and the latitude and longitude of the collection of fugitive emissions components at a well site or collection of fugitive emissions components at a compressor station imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital file, the digital photograph or video may consist of an image of the monitoring survey being performed with a separately operating GPS device within the same digital picture or video, provided the latitude and longitude output of the GPS unit can be clearly read in the digital image.”

Please see §60.5420a(c)(15)(ii)(I)(8)

“(8) If a fugitive emissions component is not tagged, a digital photograph or video of each fugitive emissions component that could not be repaired during the monitoring survey when the fugitive emissions were initially found as required in §60.5397a(h)(3)(ii). The digital photograph or video must clearly identify the location of the component that must be repaired. Any digital photograph or video required under this paragraph can also be used to meet the requirements under paragraph (c)(15)(ii)(E) of this section, as long as the photograph or video is taken with the optical gas imaging instrument, includes the date and the latitude and longitude are either imbedded or visible in the picture.”

2. The OOOOa annual report form (EPA-HQ-OAR-2017-0483-004), the General info tab, when you select yes or no from drop down for affected facilities, it states the sheet is protected.

I opened the report template at EPA-HQ-OAR-2017-0483-004 to see exactly what you are seeing. We think this sheet’s “protection” so to speak may have been an oversight. Since this template was available for public comment and the reconsideration is not yet final, we will sure be able to correct this for the final version. Thanks for bringing this to our attention. The template at EPA-HQ-OAR-2017-0483-004 , should just be used at this time for beta testing, not actual reporting. In the meantime, if you plan to use the template for reporting purposes you should plan to use the 2017 version of the draft template, because that version reflects the current OOOOa. Below is where you can access the 2017 draft template. I hope this make sense.

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/implementation-oil-and-natural-gas-air#report>

October 6, 2017- EPA posts [template spreadsheet](#) for reporting data required by the 2016 New Source Performance Standards. The 2016 standards include several electronic reporting requirements using the agency’s [Compliance and Emissions Data Reporting Interface \(CEDRI\)](#). CEDRI can now collect these reports

electronically, although the final template is not available. Until the final template is available in CEDRI, facilities may submit the Annual Report through CEDRI, but also must submit the report to the appropriate address(es) listed in 60.4(a) and (b). Note, facilities are not required to electronically submit the Annual Report until 90 days after the final template has been made available in CEDRI. EPA will update this page when final electronic reporting forms are available.

- [60.5420a\(b\) Annual Report \(Spreadsheet Template\)](#)
- [60.5422a\(a\) Semiannual Report \(Spreadsheet Template\)](#)
- [60.5422a\(b\) Initial Semiannual Report \(Spreadsheet Template\)](#)

Regards,

Amy

-----Original Message-----

Submitted on 09/24/2019 9:58AM

Submitted values are:

Name: John Turner

Email Address: jturner@rockcliffenergy.com

Comments:

Two items:

1. Exactly what equipment needs to be in photograph to comply with well affected facilities: Flowback separator and combustion device?
2. The OOOOa annual report form (EPA-HQ-OAR-2017-0483-004), the General info tab, when you select yes or no from drop down for affected facilities, it states the sheet is protected.

Thank you,

John